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Attorneys for Plaintiffs

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

16 SHOSH YONAY, an individual, and
17 YUVAL YONAY, an individual,

18 Plaintiffs,

19
20 v.

21 PARAMOUNT PICTURES
22 CORPORATION, a Delaware
23 corporation,

24 Defendant.

Case No. 2:22-CV-3846-PA-GJS

**JOINT STIPULATION
REGARDING MODIFICATION
OF TRIAL AND PRETRIAL
DATES**

District Judge: Hon. Percy Anderson
Magistrate Judge: Hon. Gail J. Standish

STIPULATION

Plaintiffs Shosh Yonay and Yuval Yonay (“Plaintiffs”) and Defendant Paramount Pictures Corporation (“Paramount Pictures” or “Defendant”) (collectively, the “Parties”) stipulate as follows:

WHEREAS, in the initial scheduling order in this case, the Court “order[ed] that discovery is to be bifurcated into liability and damages phases and stay[ed] damages discovery until the Court rules on Defendant’s anticipated motion for summary judgment on liability, or until further order of the Court.” Dkt. 30 at 2;

WHEREAS, the Parties have filed cross motions for summary judgment, with these motions scheduled to be heard on January 8, 2024;

WHEREAS, the damages expert report deadline is currently scheduled for January 5, 2024—*before* the parties’ cross motions for summary judgment are scheduled to be heard—and damages discovery is currently set to close on February 23, 2024—approximately six weeks after the parties’ cross motions for summary judgment are scheduled to be heard;

WHEREAS, the outcome of the Parties’ cross-motions for summary judgment will necessarily impact the scope of damages discovery, if any. For example, even if the motions are denied, the Court’s reasoning would likely affect the scope of damages discovery and the parties’ experts analyses;

WHEREAS, to the extent necessary, damages discovery is anticipated to “involve a high degree of complexity and disputes requiring court intervention,” as “[o]ne of the most difficult problems in the computation of profits for which the defendant is liable arises when the infringing work inextricably intermingles noninfringing material with plaintiff’s protectable material.” *See Bassil v. Webster*, 2021 WL 1235258, at *2 (C.D. Cal. Jan. 15, 2021).

WHEREAS, damages discovery further implicates Paramount Pictures’ sensitive and confidential financial information regarding the blockbuster movie,

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Date: November 14, 2023

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SIGNATURE ATTESTATION

Pursuant to CACD Local Rule 5-4.3.4(a)(2)(i), I certify that I have obtained authorization to file this document from the other signatories to this document and that all other signatories have authorized placement of their electronic signature on this document.

Date: November 14, 2023

By: /s/ Molly M. Lens
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